UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: No. 1:23-cv-11195 (SHS) (OTW)	25-md-3143 (SHS) (OTW)

<u>DECLARATION OF JENNIFER B. MAISEL</u>

I, Jennifer B. Maisel, pursuant to 28 U.S.C. § 1746, declare as follows:

1.   I am an attorney at Rothwell, Figg, Ernst & Manbeck, P.C., which represents Plaintiffs The New York Times Company ("The Times") and Daily News, LP et al. ("Daily News") (collectively, the "News Plaintiffs") in this case. I submit this declaration on behalf of the News Plaintiffs in support of the News Plaintiffs' Supplemental Letter regarding OpenAI's destruction of output log data. I have personal knowledge of the facts set forth in this declaration. If called as a witness, I could and would competently testify as to these facts under oath.

2.   Attached as Exhibit A is a true and correct copy of a March 31, 2025, letter Elana Nightingale Dawson sent on behalf of OpenAI to me.

3.   Attached as Exhibit B is a true and correct copy of an April 30, 2025, email chain between counsel for News Plaintiffs and counsel for OpenAI.

4.   Attached as Exhibit C is a true and correct copy of Dr. Lillian Dai's declaration describing her and her team's review and analysis of OpenAI's output log metadata.

5.   Attached as Exhibit D is a true and correct copy of an April 2, 2025, letter I sent on behalf of News Plaintiffs to Elana Nightingale Dawson, counsel for OpenAI.

6.   I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 7, 2025

/s/ Jennifer Maisel
Jennifer B. Maisel